



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

August 22, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: Thunderbird Products
001-16301-00031
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Section 112(j) Applicability Determination

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-5 (f) this order is effective fifteen (15) days after it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

112J DET.wpd 10/22/02



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Mr. Patrick Laux
Thunderbird Products
2200 W. Monroe St.
Decatur, IN 46733

61-50 DW

Re: Response to Review Request No. 16301:
Section 112(j) Applicability Determination
Plant ID: 001-00031

Dear Mr. Laux:

Thunderbird Products, located at 2200 W. Monroe Street, Decatur, Indiana, 46733, submitted a request for an applicability determination regarding the requirements of Section 112(j) of the Clean Air Act (CAA) on May 15, 2002. The letter was submitted in accordance with 40 CFR 63.52(d)(1) and requested that the Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) determine if Thunderbird Products is subject to the requirements of Section 112(j) (40 CFR 63.50 through 63.56) for the following source categories:

- Engine Test Cells / Stands; and
- Plastic Parts Surface Coating.

Pursuant to 40 CFR 63.50, the requirements of Section 112(j) will apply only if your entire source is a major source of hazardous air pollutants (HAPs) and one or more of your processes or emissions units belong in a category or subcategory for which the United States Environmental Protection Agency (U.S. EPA) has failed to promulgate an emission standard on or before the Section 112(j) deadline.

MAJOR SOURCE DETERMINATION

The information submitted indicates that Thunderbird Products is a major source of HAPs. In addition, the issued Title V permit, T001-5903-00031, for Thunderbird Products, issued on October 14, 1999, also indicates that the source is a major source of HAPs. Since Thunderbird Products is a major source of HAPs, IDEM, OAQ evaluated the source categories for which Thunderbird Products requested an applicability determination.

SOURCE CATEGORY DETERMINATIONS

1. Engine Test Cells / Stands NESHAP

Since the final MACT standard for Engine Test Cells / Stands was promulgated on May 27, 2003, Thunderbird Products is no longer subject to Section 112(j) for that source category; however, Thunderbird Products may be subject to the promulgated MACT standard. Thunderbird Products should check the applicability of the MACT standard. If the promulgated MACT is applicable, Thunderbird Products shall:

- (a) Comply with the promulgated MACT standard, including the initial notification requirements of the MACT standard, in accordance with the schedule provided in the MACT standard; and

- (b) Submit an application for a significant permit modification under 326 IAC 2-7-12 no later than nine (9) months prior to the compliance date for the MACT. The application should include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed. If the permit renewal application is due more than nine (9) months prior to the compliance date, you may include the required information in a timely permit renewal application instead of submitting an application for a significant permit modification.

2. **Plastic Parts and Products Surface Coating NESHAP**

IDEM, OAQ used the following information to determine if the eight (8) paint spray booths, identified as, SB1, SB2, SB3, SB4, SB5, SB6, SB7 at Thunderbird Products belong to the Section 112(j) affected source category, Plastic Parts and Products Surface Coating:

- The Part 1 Maximum Achievable Control Technology (MACT) Application;
- The original Title V permit for Thunderbird Products, T001-5903-00031, issued on October 14, 1999;
- The first Administrative Amendment to the original Title V permit for Thunderbird Products, T001-11985-00031, issued on October 11, 2002;
- The federal rule proposal from the December 4, 2002 *Federal Register*, and
- Background information available at the U.S. EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>.
- The final rule for the *National Emissions Standard for Hazardous Air Pollutants for Boat Manufacturing*, promulgated and effective on August 22, 2001 and available through the U.S. EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/boat/boatpg.html>.

There is no final MACT Standard for the Plastic Parts Surface Coating source category. The proposed rule for this source category was published on December 4, 2002. Section 63.4481(c)(11) of the proposed rule for the Plastic Parts Surface Coating NESHAP indicates that this subpart does not apply to surface coating of fiberglass boats or parts of fiberglass boats where the facility is subject to the requirements for fiberglass boat manufacturing facilities in the NESHAP for boat manufacturing (40 CFR, Part 63, Subpart VVVV), except where the surface coating of the boat is a post-mold coating operation performed on personal watercraft or parts of personal watercraft. This subpart applies to post-mold coating operations performed on personal watercraft or parts of personal watercraft. For the purposes of this subpart, a personal watercraft is defined as a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or persons sitting, standing, or kneeling on the vessel, rather than in the conventional manner of sitting or standing inside the vessel.

According to the Title V permit for Thunderbird products, the Permittee manufactures fiberglass pleasure boats. Since the Permittee does not manufacture personal watercraft, it is not likely that the eight (8) paint spray booths, identified as, SB1, SB2, SB3, SB4, SB5, SB6, SB7 at Thunderbird Products belong to the Section 112(j) affected source category, Plastic Parts and Products Surface Coating.

Pursuant to 40 CFR 63.52(e)(2)(i), and Section 63.5689 of the promulgated Boat Manufacturing NESHAP, and based on the information available at this time for the Plastic Parts and Products Surface Coating NESHAP, IDEM, OAQ has determined that following processes and emissions units at Thunderbird Products do not belong to the affected source category, Plastic Parts and Products Surface Coating:

- Five (5) IMRON paint spray booths, identified as, SB1, SB2, SB3, SB4, and SB5, with a maximum capacity of 0.078 boats per hour per booth, using dry filters as control, and exhausting to stacks/vents, #18, #19, #20, #21, and #22; and
- Three (3) paint spray booths, identified as SB6, SB7, and SB8, each with a maximum capacity of 0.025 boat units per hour, each using dry filters as particulate matter overspray control, and each exhausting to stacks/vents #033, #034, and #035, respectively.

Thunderbird Products will not be required to submit a Part 2 MACT Application in accordance with 40 CFR 63.53(b) for this affected source category. If Thunderbird Products is subject to Section 112(j) for any other source categories, Thunderbird Products shall submit a Part 2 MACT Application for those source categories.

If U.S. EPA promulgates a final MACT standard prior to IDEM, OAQ issuing a permit containing the Section 112(j) determination requirements, a source is no longer subject to Section 112(j) for that source category, including the requirement to submit a Section 112(j) Part 2 MACT Application. A source is still subject to Section 112(j) for any other source categories that do not have promulgated MACT standards.

This determination is based on the information provided by Thunderbird Products, IDEM, OAQ records, and the information currently available from the U.S. EPA. Note that if additional equipment or capacity is added or operational practices are changed (e.g., switching solvents from a solvent that contains no HAPs to a solvent containing HAPs), the Section 112(j) requirements may be triggered in accordance with 40 CFR 63.52(b). If the events described in 40 CFR 63.52(b) occur at the source, Thunderbird Products shall submit a Part 1 MACT Application in accordance with the requirements and schedule contained in 40 CFR 63.52(b).

Questions should be directed to Kim Cottrell, IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027 and ask for Kim Cottrell at extension 3-0870, or dial (317) 233-0870.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

KLC

CC: File – Adams County
Adams County Health Department
Air Compliance – Ryan Hillman
Air Permits – Madhurima Moulik
Administration Section
U.S. EPA Region V – Genevieve Damico

Mr. Jim Laux
Thunderbird Products
2200 W. Monroe St.
Decatur, IN 46733